

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JANE DOE J.R.L.,

Plaintiff,

v.

**HILTON DOMESTIC OPERATING  
COMPANY INC.; HILTON DOMESTIC  
MANAGEMENT LLC; and CROSSTOWN  
CENTER HOTEL LLC d/b/a HAMPTON  
INN & SUITES,**

Defendants.

Civil Action No.: 1:24-cv-13227

**PLAINTIFF'S MOTION TO PROCEED UNDER PSEUDONYM**

The Plaintiff, by counsel, respectfully moves this Honorable Court for leave to proceed in this action under the pseudonym Jane Doe (J.R.L.) In support of this motion, Plaintiff states that this action involves highly personal private information as well as emotional, physical, and sexual abuse of a vulnerable individual. Plaintiff fears repercussions should her identity be disclosed to the public, magnifying the harm that she has already suffered. Plaintiff is a member of a vulnerable population and the risks to her are not outweighed by any countervailing considerations. Defendants are not prejudiced by Plaintiff proceeding in pseudonym.. Plaintiff further relies upon the memorandum of law submitted herewith.

For the reasons set forth herein and in the attached memorandum, Plaintiff respectfully requests that this honorable Court enter the attached Order. *See [Proposed] Order, attach hereto as*

Exhibit 1.<sup>1</sup>

3/27/25 - Accused  
must opp'sn. in  
Defendant names  
Several reasonable  
limitations. The parties  
shall confer as appropriate  
*Patty Sue*

<sup>1</sup> Should the Court not be inclined to grant this motion, for whatever reason, Plaintiff respectfully requests the opportunity to amend her complaint, with the amendment relating back to the date of original filing.